



RECEIVED

JUN 27 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

June 27, 1996

The Honorable William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: CC Docket No. 96-128; FCC 96-254

Dear Mr. Secretary:

Thank you for the opportunity to comment on the FCC's proposed rule governing pay telephone reclassification and compensation provisions of the Telecommunications Act of 1996.

NATSO, Inc. is the professional and legislative representative of America's \$28 billion travel plaza and truckstop industry. The association was founded in 1960 and currently has nearly 1,100 travel plaza and truckstop members.

General Comments

As one of the industry groups offering the largest number of payphones to travelers nationwide, NATSO has a significant interest in this proposed rule. Truckstop and travel plaza owners have a direct economic stake in the operation of the payphones that are located directly on their property. And because they attempt to make the places where drivers use the phones as comfortable and clean as possible, they have a direct impact on the economic viability of these phones as well.

Payphones are not simply a convenience for professional drivers; they are a necessity and an important revenue source for truckstops. Not only does the travel plaza owner devote prime floor space to phone rooms, phones are frequently available in the truckers' section of the restaurant. In a truckstop restaurant, as with other restaurants, the amount of revenue generated is directly affected by the number of patrons served. The time each patron spends at a booth or table, then, affects the number of customers that can be served in a given time period and, by extension, the amount of revenue generated for the truckstop. Customers who use phones during

No. of Copies rec'd
List ABCDE

0210

their meal spend significantly more time at that booth, decreasing the customer turnover at the table and the amount of restaurant revenue. Truckstop owners should be able to expect to make up at least a portion of that revenue through phone compensation.

It is estimated that payphone service and location providers are currently compensated for just one out of every eight calls at a truckstop or travel plaza. The number of dial-around calls is constantly increasing, further decreasing the number of revenue-generating calls.

Per-Call Compensation Amount

The location provider should be compensated at a flat, fixed amount for each and every call that originates from a phone on his/her property. In addition, the FCC should set a maximum allowable charge based on a call's duration for long-distance calls from a payphone. Compensation levels should be adjusted annually to ensure that compensation levels accurately reflect current costs to the payphone and location providers.

We feel that because currently just one out of every eight calls from a truckstop generate revenue for payphone and location providers, interim compensation, paid until the effective date of the final rules, should be instituted.

Ability of BOCs to Negotiate with Location Providers on the Presubscribed Interlata Carrier and Ability of PSPs to Negotiate with Location Providers on the Presubscribed Intralata Carrier

We believe it is absolutely critical that the location provider continue to make the sole decision in determining inter/intra-lata services in connection with the choice of payphone providers. A travel plaza owner's ability to respond to the needs of professional drivers and the traveling public is essential to business success or failure. The location provider, then, is best suited to determine what services are demanded by users at his/her location.

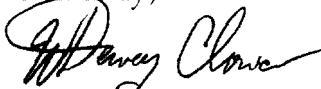
Changing the way a carrier is currently selected could have serious repercussions on a travel plaza owner's ability to offer products and services that patrons have come to expect. In addition, this decision-making authority is the only assurance location providers have that they will be properly compensated for the use of payphones on

NATSO, Inc., representing America's travel plazas and truckstops
Docket No. 96-254
June 27, 1996
Page 3

their premises. Payphones in many locations, and certainly those in truckstops, represent significant investments by the property owners--investments in equipment, space and maintenance. As rational business owners, travel plaza operators do not make investments which offer no hope of return.

Again, thank you for the opportunity to comment on this proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Dewey Clower". The signature is fluid and cursive, with the first name "W. Dewey" and the last name "Clower" clearly distinguishable.

W. Dewey Clower
President & CEO

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

- o Microfilm, microform, certain photographs or videotape.

- ~~o~~ Other materials which, for one reason or another, could not be scanned into the RIPS system.

DISKETTE

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.